

Motion granted. Responsive pleading due 1/20/20.

/s/ John R. Adams

U.S. District Judge

11/27/19

IN THE UNITED STATES DISTRICT COURT  
Northern District of Ohio Eastern Division

TRACEY CAYLOR et al.,

Plaintiff,

vs.

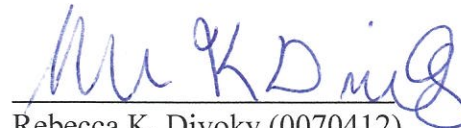
ASHTABULA COUNTY dba  
ASHTABULA COUNTY NURSING &  
REHABILITATION CENTER

Case No. 1:19-cv-2628

**Motion for Extension of Time**

Now comes the Defendant, the Ashtabula County Nursing and Rehabilitation Center, by and through their Counsel, Rebecca K. Divoky, Assistant Prosecutor to Nicholas A. Iarocci, the duly elected and acting Prosecuting Attorney for Ashtabula County, Ohio, and moves this Honorable Court for an extension of time of Sixty (60) days, until January 20, 2020, to file an answer to Plaintiff's Class Action Compliant with Jury Demand. This is the first extension of time requested by Defendant and is not being made for purposes of delay. This extension of time is needed to obtain specialized outside counsel.

Respectfully submitted,



Rebecca K. Divoky (0070412)

Assistant Prosecutor

**NICHOLAS A. IAROCCI (0042729)**

**PROSECUTING ATTORNEY**

25 West Jefferson Street

Jefferson, Ohio 44047

(440) 576-3662, fax (440) 576-3600

rkdivoky@ashtabulacounty.us